MICHAEL P. PAPPAS LAW FIRM, P.C.

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Photon's redactions to the memorandum of law, Dkt. 149, and witness declarations, Dkt. 150, appear to be overbroad. For example, the memorandum of law redacts substantial amounts of purely legal arguments on the proper measure of damages, a topic previously publicly addressed in the publicly filed versions of the Court's prior Opinion and Order and ZoomInfo's memorandum of law. *Compare* Dkt. 149 at i, 2-6 *with* Dkt. 121 at 14-15, Dkt. 142 at 6-8. By June 17, 2022, Photon shall file new redactions of the documents along with a letter justifying the redactions with particularity under the doctrine of *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006), per the Court's Individual Rule 4(B)(ii).

June 3, 2022

VIA ECF

The Honorable John P. Cronan
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED.
Date: June 14, 2022

New York, New York

JOHN P. CRONAN
United States District Judge

Re: **North America Photon Infotech, Ltd. v. ZoomInfo LLC, 1:20-cv-02180-JPC**

Dear Judge Cronan:

On behalf of Plaintiff/Counterclaim-Defendant North America Photon Infotech, Ltd. ("Photon"), we respectfully move for approval to seal and redact certain portions of Photon's pretrial filings pursuant to Your Honor's Individual Rule 4(B). The sealing and redactions involve information contained in Photon's declarations and pretrial memorandum of law that ZoomInfo has previously indicated it deems confidential concerning its pricing and monitoring practices, including as described in ZoomInfo's letter motion to seal dated June 3, 2022. In an abundance of caution, we are filing these documents under seal in their entirety, and will file redacted versions as soon as possible after conferring with ZoomInfo on what specific information it wishes to be sealed and redacted.

Photon therefore requests that its request for sealing be granted.

MPP/mp

Respectfully submitted,

s/Michael Pappas

Michael P. Pappas

cc: Counsel for Defendant (via ECF)